

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BILLY McDONALD,	)	
	)	
Plaintiff,	)	<b>No. 08 C 4262</b>
	)	
v.	)	
	)	JUDGE GUZMAN
CITY OF CHICAGO, ILLINOIS and CHICAGO	)	
POLICE OFFICER W. A. SESKI, Star No. 7520,	)	Magistrate Judge Schenkier
and CHICAGO POLICE OFFICER M. J.	)	
CONNOLLY, Star No 16869,	)	
	)	
Defendant.	)	

**DEFENDANT CITY OF CHICAGO’S MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendant, City of Chicago (“City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully move for an extension of time to September 25, 2008 to answer or otherwise plead in response to Plaintiff’s complaint. In support of this motion, Defendant states the following:

1. Plaintiff filed his Complaint on or about July 28, 2008. The City was served with plaintiff’s Complaint on or about August 5, 2008.
2. Undersigned counsel for the City was assigned to this case on or about August 20, 2008, the first opportunity that undersigned counsel had to review plaintiff’s Complaint.
3. Undersigned counsel is in the process of reviewing plaintiff’s Complaint and gathering documents responsive to the Complaint.
4. This motion is the City’s first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the City to respond properly to the allegations in plaintiff’s Complaint.
5. Undersigned counsel spoke with plaintiff’s attorneys, Jeffrey Granich, by

telephone on August 20, 2008. Mr. Granich said he has no objection to the City's request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to September 25, 2008 to answer or otherwise plead in response to plaintiff's Complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES,  
CORPORATION COUNSEL  
CITY OF CHICAGO

By: /s/ Kathleen D. Manion  
KATHLEEN D. MANION  
Assistant Corporation Counsel

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